IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
Lordstown Motors Corp., et al.,1) Case No. 23-10831 (MFW)
Debtors.) (Jointly Administered)
) Hearing Date: TBD Objection Deadline: August 10, 2023, at 4:00 p.m. (ET)

NOTICE OF APPLICATION AND HEARING

PLEASE TAKE NOTICE that, on July 27, 2023, the debtors and debtors in possession in the above-captioned cases (collectively, the "**Debtors**"), filed the *Debtors' Application* for an Order Authorizing the Retention and Employment of Baker & Hostetler LLP as Special Litigation and Corporate Counsel for the Debtors Nunc Pro Tunc to the Petition Date (the "Application") with the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Application must be in writing and filed with the Clerk of the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 on or before **August 10, 2023 at 4:00 p.m.** (**prevailing Eastern Time**).

PLEASE TAKE FURTHER NOTICE that if any objections to the Application are received, the Application and such objections shall be considered at a hearing before The Honorable Mary F. Walrath, United States Bankruptcy Judge for the District of Delaware, at the Court, 824

The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

North Market Street, 5th Floor, Courtroom 4, Wilmington, Delaware 19801 on **a date and time to be determined**.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO THE APPLICATION ARE TIMELY FILED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

Dated: July 27, 2023

Respectfully submitted,

/s/ James F. McCauley

RICHARDS, LAYTON & FINGER, P.A.

Kevin Gross (No. 209)

Daniel J. DeFranceschi (No. 2732)

Paul N. Heath (No. 3704)

Amanda R. Steele (No. 5530)

Jason M. Madron (No. 4431)

James F. McCauley (No. 6991)

One Rodney Square

920 N. King Street

Wilmington, DE 19801

Telephone: (302) 651-7700

Facsimile: (302) 651-7701

gross@rlf.com

defranceschi@rlf.com

heath@rlf.com

steele@rlf.com

madron@rlf.com

mccauley@rlf.com

Proposed Co-Counsel to Debtors and Debtors in Possession

WHITE & CASE LLP

Thomas E Lauria (admitted pro hac vice)

Matthew C. Brown (admitted pro hac vice)

Fan B. He (admitted pro hac vice)

200 South Biscayne Boulevard, Suite 4900

Miami, FL 33131

Telephone: (305) 371-2700

tlauria@whitecase.com

mbrown@whitecase.com

fhe@whitecase.com

David M. Turetsky (admitted *pro hac vice*)

1221 Avenue of the Americas

New York, NY 10020

Telephone: (212) 819-8200

david.turetsky@whitecase.com

Jason N. Zakia (admitted pro hac vice)

111 South Wacker Drive, Suite 5100

Chicago, IL 60606

Telephone: (312) 881-5400

izakia@whitecase.com

Roberto Kampfner (admitted *pro hac vice*)

Doah Kim (admitted pro hac vice)

RJ Szuba (admitted pro hac vice)

555 South Flower Street, Suite 2700

Los Angeles, CA 90071

Telephone: (213) 620-7700

rkampfner@whitecase.com

doah.kim@whitecase.com

rj.szuba@whitecase.com

Counsel to Debtors and Debtors in Possession